

New Hampshire Special Education Program Approval Report

SAU 10

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Final Report

February 15, 2000

Visit Conducted on:

Elementary Schools - November 13-14, 1999

Middle/High Schools - November 15-16, 1999

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Table of Contents

- I. Introduction
- II. Status of Corrective Actions from Previous On-Site
- III. Issues of Significance
- IV. Citations to the New Hampshire Standards for the Education of
Students with Disabilities

(Commendations, Citations and Suggestions for each school)

Note: It should be noted that suggestions are not considered corrective actions and therefore are given as technical assistance. The district is not mandated to implement them.

New Hampshire Special Education Program Approval Report

SAU 10

I. INTRODUCTION:

A New Hampshire Department of Education Special Education Program Approval visit was conducted at SAU 10 comprised of the following schools: Preschool Programs, Derry Village School, East Derry Memorial Elementary School, Floyd Elementary School, Grinnell Elementary School, South Range Elementary School, Gilbert H. Hood Middle School, West Running Brook Middle School and Pinkerton Academy. The elementary visiting team met on November 13-14, 1999 and the middle/high school visiting team met on November 15-16, 1999 in order to review the status of special education services being provided to eligible students.

Activities related to this evaluation included the close review of all the teaching certifications of special education staff, analysis of SPEDIS data and random inspection of student records. Interviews were held with the Special Education Director, building principals, regular and special education teachers, related service personnel and administrators as time and availability permitted. In addition, the team conducted parent interviews via telephone. Throughout the visit, the team had full cooperation from the school personnel and this helpfulness was greatly appreciated.

The report that you are about to read represents the consensus of all the members of the visiting team. Please keep in mind that this is a "report for exception", meaning that only exceptions to the NH State Standards have been addressed. If a component is not mentioned, that does not mean that the team did not review it; it just means that there were no citations of noncompliance to the Standards found in that particular area.

II. STATUS OF PREVIOUS ON-SITE: *Conducted on January 4-5, 1994*

SAU 10 has made many program improvements since the last program approval evaluation conducted in April of 1994. It was evident to the visiting teams that a genuine attempt to rectify citations has been made by staff and administration throughout the SAU. Based on review of the 1999 application materials, interviews with staff and parents, and visits to each school, it was the consensus of the teams that several of the previous citations noted in 1994 have been resolved, while others are still in process of being addressed.

Specifically, the visiting teams were impressed with efforts put forth by the SAU to ensure that evaluations are being conducted in a timely manner. Additional staff have been hired, which has resulted in improved documentation that diagnostic assessments are conducted as outlined in state and federal special education regulations. Upon visiting each of the facilities within the Derry School District and Pinkerton Academy, it became evident that the SAU tries hard to ensure that evaluation/placement and IEP teams have appropriate composition and that parents are involved in the educational decisions regarding their children.

The teams were also pleased to note the extensive efforts put forth by the SAU in the area of curriculum development and to ensure that special education programming reflects the general education curriculum and the NH State Curriculum Frameworks. It was further noted by the visiting teams that the Derry School District has done an outstanding job in upgrading technology in each of the schools and for the most part, it was evident that staff have adequate supplies, materials and equipment.

Overall, while significant gains have been made in addressing the above mentioned issues, the team did note that there is a continued need to improve and refine special education procedures in each school, as well as strengthen the overall monitoring of the special education process from referral to identification. As in the past, immediate attention needs to be given to improved organization and a systematic approach to maintaining student records and ensuring that essential information is well documented in student files. The visiting teams were pleased to note that the computerized IEP format currently used by staff is in process of being revised to ensure all components are included and that goals and objectives will soon reflect alignment with the general curriculum. However, it is important to note that the existing IEP forms currently being used are lacking required criteria and that the IEPs varied in quality and content depending upon the individuals who wrote them. The issue of documenting provision of extended school year is in process of being addressed and the visiting team found inconsistent evidence that such programming is being considered annually for all students with disabilities. It was further noted that the credentials of special education staff once again is an issue that warrants continued attention. Several of the teachers holding special education positions do not hold certification in special education and, at the time of the visit, there are no staff who hold endorsements in the area of EH (emotional disabilities).

Overall, the Derry School District has made gains in meeting compliance with state and federal special education regulations and in addressing the issues of noncompliance noted in the previous program approval report. The visiting teams would like to recognize all staff and administrators within the SAU for their dedication and for the provision of quality programming in each of the schools.

III. ISSUES OF SIGNIFICANCE:

Within each of the schools in SAU 10 there is a supportive, enthusiastic atmosphere for the provision of services for all students in the least restrict environment. This enthusiasm and support is fostered throughout the SAU by faculty, administration, support service personnel, secretarial staff and parents. In many ways it is clear that the Derry Schools are working hard to offer a wide continuum of program options to all children. Children with disabilities enrolled at the elementary and middle schools are involved in all aspects of school life, including access to the general curriculum, extra curricula activities and sports. All of the staff within SAU 10 appear to be committed to providing quality services to all students and teachers were consistently described as dedicated, child centered and outstanding role models for children. In SAU 10, it is evident that all students are active participants in their own learning and that the individual needs of all children are being met.

Although there are many praiseworthy things happening in SAU 10, there were some areas of concern raised by the visiting team. The first concern that surfaced was in the monitoring of childfind activities and the need for updating and refinement of existing special education policies. The visiting team unanimously agreed that the SAU has made many program improvements since the last review. The team saw a dedicated staff implementing good programs, but there was often a lack of documentation of this work. As reflected in the review of student records and in the application materials submitted for this visit, there are no formalized special education procedures or a manual distributed to staff which outlines procedures to follow. This has resulted in many "housekeeping" types of errors and oversights in compliance.

The SAU has not reviewed, revised or submitted changes to special education policies since 1994, and there has been little formalized professional development to familiarize the staff with school district policy, procedures, state standards or federal special education regulations. It was also noted that staff within Derry Schools need further guidance and clarification between pre-referral activities and the special education process from referral to placement. Also in need of continued attention is improved organization and systematic approach to maintaining student records. In student files, essential information was difficult to locate and sometimes missing. Currently the professional teaching staff are responsible for most of their own clerical tasks and the team felt that their time should be dedicated to utilization of professional skills, not clerical tasks that could be easily accomplished through

secretarial assistance. Overall, the visiting team agreed that there should be more consistent monitoring of the special education referral and evaluation process in each building.

The second issue that surfaced was the need for the SAU to address the crowded conditions at each of the schools. At this time, the facilities are at capacity and there is not adequate space to accommodate the needs and learning activities of the children enrolled. This is especially true for the preschool children currently being serviced in the SNAP Program. Serious consideration needs to be given to relocating this program to a facility of sufficient size and space in the least restrictive environment to ensure that the children have regular interaction with non-disabled peers. The visiting team recognized that space in all the buildings is at a premium, student teacher ratios are high and that crowded conditions make it difficult to provide programming in an inclusionary setting. It also makes it extremely difficult to provide adequate space for programming of related services, conducting educational assessments, and holding meetings and conferences with parents.

Another concern raised by the team was centered on the number of high school students that are currently placed in out-of-district facilities and the lack of available statistics related to the drop out rate for at risk students and those with disabilities. For an SAU committed to providing the least restrictive environment for all children, having approximately 60 students in placed in high school programs outside of Pinkerton Academy is quite high. During this brief visit, there were no solid figures available regarding the drop out rate of educationally disabled students at Pinkerton Academy. The visiting team strongly suggests that the SAU begin to take a look at this population of students and explore possible options for program development within Pinkerton Academy or cooperatively with other school districts facing the same issues.

The last issue that surfaced is closely related to the above. The visiting team discussed, in depth, the issue of least restrictive environment and equal access to educational opportunities, specifically for those students with disabilities enrolled at Pinkerton Academy. The visiting team agreed that students with disabilities attending Pinkerton Academy are not consistently provided equal educational opportunities to all aspects to the schools curriculum, and in some cases the opportunity to earn a high school diploma. The practice of excluding some students with disabilities from the opportunity of completing a course of studies leading to a high school diploma is questionable and will require further clarification.

Overall, SAU 10 has made significant growth in program improvements since the 1994 special education program approval visit. The attitude of all staff and administration throughout the SAU was enthusiastic and committed toward providing the best possible education for all students, regardless of their ability levels.

Each of the schools within SAU 10 has achieved a considerable level of success in the implementation of inclusionary practices, and at this time there are many praiseworthy things happening in both special and regular education programming. The team would like to recognize and reinforce the philosophy, vision and goals that each school is working toward and commend them for their support of quality services to all children.

IV. COMMENDATIONS, CITATIONS AND SUGGESTIONS: SAU-WIDE

Name of Program(s) Visited: All

COMMENDATIONS:

- There is a spirit of teamwork, collaboration and open lines of communication among all staff throughout the SAU.
- The atmosphere in each Derry school encourages the provision of services in the least restrictive environment.
- The SAU is commended for the extensive effort put forth to develop general curriculum aligned with the NH Curriculum Frameworks.
- Staff are commended for the work that has begun in development of IEPs to reflect general education curriculum.
- The staff and administration in each school were repeatedly described as skilled, highly motivated and dedicated to the teaching/learning process.
- The parents of the Derry School District are commended for their continued support and active involvement in the Derry Schools.
- There has been a genuine attempt in SAU 10 to resolve issues of noncompliance noted during the previous program approval visit.
- The central office administration is commended for their support of special education.

CITATIONS: (in numerical order)

<u>Ed. 1103.01,</u> <u>Ed. 1103.02</u> <u>Ed. 1103.03</u>	<u>LEA Child Find Program:</u> SAU 10 needs to update and develop childfind policies that reflect current practice and requirements of state and federal special education requirements. This includes, but is not limited to, contacting all schools and social service agencies within their jurisdiction and advising them of the LEA's responsibility to identify and evaluate all students suggested or known to have an educational disability.
<u>Ed. 1105.01(b)</u>	<u>On-Going Requirements:</u> The LEA has not reviewed its special education policies on an annual basis to make revisions as necessary.
<u>Ed. 1107.01(a-g)</u>	<u>Testing Instruments:</u> LEA policy regarding assessment procedures must be updated to reflect requirements outlined in CFR 300.530 mad CFR 300.532.
<u>Ed. 1107.02(a-e)</u>	<u>Process:</u> The Derry School District must refine and establish a consistent referral process and ensure that all staff and parents are aware of how the process is implemented.
<u>Ed. 1109.01</u>	<u>Individual Education Plan:</u> The IEP forms used by SAU 10 need to be updated to reflect federal IDEA requirements.
<u>Ed. 1109.09</u> <u>Ed. 1109.10</u>	<u>Distribution of Copies of IEPs</u> <u>Accountability for Achievement of IEPs</u>

Ed. 1109.11

Monitoring and Annual Evaluation of IEPs

SAU 10 needs to develop written policies/procedures for the standards noted above.

IV. COMMENDATIONS, CITATIONS AND SUGGESTIONS: SAU-WIDE, Continued

Name of Program(s) Visited: All

<u>Ed. 1111.01</u>	<u>Extended School Year Programming</u>
<u>Ed. 1119.09(c)</u>	Upon review of student records and interviews with staff and parents, it became apparent that extended school year programming is not consistently considered and/or discussed for all students with disabilities. Staff and parents have varying interpretations of extended school year eligibility and programming.
<u>Ed. 1115.01</u>	<u>Policy Statement</u> SAU 10 needs to develop a policy statement ensuring that students with disabilities are educated (to the maximum extent appropriate) with non-disabled peers.
<u>Ed. 1115.04(a-f)</u>	<u>Continuum of Alternative Education Environments</u> The SAU needs to provide written descriptions that illustrate the school districts range of educational environments.
<u>Ed. 1115.05</u>	<u>Procedure for Providing Home-Based Programming in Excess of 45 Days in a Calendar Year</u> The Derry School District has no written policy reflecting this standard.
<u>Ed. 1117.02</u>	<u>Jurisdiction</u>
<u>Ed. 1117.03</u>	<u>Responsibility of the Local Education Agency</u>
<u>Ed. 1117.04</u>	<u>Level of Expenditure</u>
<u>Ed. 1117.05</u>	<u>Consultation with Representatives of Private School Students</u>
<u>Ed. 1117.06</u>	<u>Needs, Number of Students, Types of Services</u>
<u>Ed. 1117.07</u>	<u>Information the Local Education Agency Shall Submit in an Application</u>
<u>Ed. 1117.08</u>	<u>Separate Classes Prohibited</u>
<u>Ed. 1117.09</u>	<u>Use of Funds</u>
<u>Ed. 1117.10</u>	<u>Personnel</u> The SAU needs to develop written policies/procedures related to special education services for students with disabilities who reside in the jurisdiction and are placed by the parent(s) in a private facility.
<u>Ed. 1119.06(d)</u>	<u>Facilities and Location</u> Throughout the SAU, classrooms are crowded which impedes the ability of staff to accommodate the individual learning needs of students with disabilities.
<u>Ed. 1119.08</u>	<u>Diplomas</u> The LEA and Pinkerton Academy are not ensuring that all students with disabilities have an equal opportunity to complete a course of studies leading to a high school diploma.
<u>Ed. 1121.03</u>	<u>Initiating a Request for Appointment of a Surrogate Parent</u> The SAU has no written procedures outlining the process for requesting the appointment of a surrogate parent.

IV. COMMENDATIONS, CITATIONS AND SUGGESTIONS: SAU-WIDE, Continued

SUGGESTIONS:

- A formalized policies/procedures manual needs to be developed that clearly outlines the special education process from referral to identification. Included in this manual should be standardized forms, copies of federal and state regulations, timelines that must be met and descriptions of services made available to students with disabilities.
- Accompanying this manual, should be ongoing training for all staff for effective implementation and adherence to policy and procedure.
- Special education staff within the SAU need to meet regularly to provide support and technical assistance to one another. This will provide an opportunity to share skills and expertise and to insure smooth transitions and consistency in adherence to policy and procedure.
- Staff and administration at the building level need to be kept informed of recent legislation, state policy, federal regulations and recent developments in the field of special education.
- The SAU may want to consider the establishment of building level special education coordinators to oversee compliance and programming in each school.

PRESCHOOL AND COMMUNITY OUTREACH PROGRAM

PROGRAM(S) VISITED: 1) SNAP 2) Preschool Special Needs
3) Outreach and Community Services

COMMENDATIONS:

- The personnel at SNAP are very team oriented and child focused.
- There are regular home visits for transitioning children from Early Supports and Services and as appropriate for other intakes.
- The ESL teacher is included in review of ESL students.
- The behavioral consultant has been very beneficial to the program.
- Community based placements demonstrate strong partnerships with the Derry School District.

CITATIONS: (in numerical order)

<u>Ed. 1107.01(c)</u>	1 file: lacked appropriate speech/language assessments.
<u>Ed. 1109.01</u>	OT services are not being provided due to staff turnover.
<u>Ed. 110901(d)</u>	3 files: lacked indication of expectation or regular class participation.
<u>Ed. 1109.01(k)</u>	1 file: no statement of financial responsibility contained in IEP.
<u>Ed. 1119.03(a)</u>	The SNAP Program has no curriculum. The staff create one yearly based on IEPs.
<u>CFR300.344</u> <u>1109.03(b)(1)</u>	The LEA representative is typically the Assistant Special Education Director. When she is not available, the team is unclear about who has the authority to fill the role of the LEA representative.
<u>Ed. 1109.04(a)</u>	2 files: lacked documentation that parents had been given procedural safeguards at IEP meeting.
<u>Ed. 1109.06</u>	Facilities: Office, evaluation and therapy space at SNAP are insufficient for provision of services to students.
<u>Ed. 1111.01</u>	3 files: contained a blanket statement and no documentation that ESY was actually considered.
<u>Ed. 1115.06</u>	Students enrolled in the SNAP program are not afforded the opportunity to interact with non-disabled peers in the least restrictive environment.
<u>Ed. 1115.06</u>	Least Restrictive Environment: students placed in the SNAP preschool program are not educated with non-disabled peers.
<u>CFR300.346(01)(a)</u>	3 files: Measurable goals were not included on IEP. Staff report waiting for new computerized IEPs to meet this requirement.

CFR300.347(a)(4) 2 files: contained no explanation of the extent to which child will not participate with non-disabled peers in regular class setting.

PRESCHOOL AND COMMUNITY OUTREACH PROGRAM, Continued

CITATIONS: (in numerical order)

Ed. 1119.07(a) The preschool program(s) within SAU 10 offer services with no special education teacher on staff.

CFR300.532 1 file: academic performance was not assessed.

Section 612 Transition Initial referral held and no disposition done for several months.

The preschool program continues to offer special education programming without a certified special educator on staff or in direct, regular consultation. Furthermore, the program is self-contained with students having very limited inclusionary experiences with non-disabled peers.

SUGGESTIONS:

- Preschool staff need more focused professional development opportunities around new special education laws and preschool curriculum.
- The self-contained program does not allow for children to participate with non-disabled peers. The district needs to move forward with proposal in fall or make other changes to ensure provision of least restrictive environment.
- Be sure to include preschool staff and students in district events.
- The district is encouraged to move forward with the parent support group.
- Consider adding additional personnel with special education background to preschool staff.
- Staff need additional professional development in the area of other academic assessments for preschool students.
- The district needs to take a critical look at staffing patterns, specifically around case management.
- The SAU may need to separate speech and language responsibilities to be sure of effective services.

DERRY VILLAGE SCHOOL

PROGRAM(S) VISITED: 1) Resource Room 2) Grades 2, 3 & 5 Classrooms

COMMENDATIONS:

- Staff are committed and were very helpful to the visiting team.
- The mentor program is helpful for new teachers.
- Training and workshops are offered to staff.
- The assistant principal is organized and well informed.
- The space needs are being addressed with a new addition to the school.

CITATIONS: (in numerical order)

<u>Ed. 1107.02</u>	3 files: lacked written notice of referral or disposition of referral. 3 files: lacked copy of procedural safeguards at referral.
<u>Ed. 1107.05(k)</u>	2 files: evaluations not completed in 45 days and no documentation of extension. 1 file: evaluation for OT still outstanding.
<u>Ed. 1109.01</u>	3 files: no measurable goals that enable the child's involvement in general curriculum.
<u>Ed. 1109.01(c)</u>	3 files: IEP lacked extent that student will participate in regular education.
<u>Ed. 1109.01(d)</u>	3 files: IEP lacked expectations for student's participation in regular education.
<u>Ed. 1109.01(i)</u>	3 files: IEP lacked objective criteria or evaluation procedures on an annual basis.
<u>Ed. 1109.03</u>	2 files: lacked meeting notice for evaluation plan or attendance. Permission to test only indication of status of referral.
<u>Ed. 1109.03</u>	2 files: no documentation of meeting notice or notes in regards to placement.
<u>Ed. 1109.04</u>	3 files: parents were not given 10-day notice of IEP meeting. No indication of safeguards at notice of IEP.
<u>Ed. 1109.11</u>	1 file: no evidence of systematic monitoring of IEP in file. 3 files: no indication of progress; will indicate achievement of goals by end of year.
<u>Ed. 1111.01</u>	2 files: no indication of extended school year: 1 file, for present IEP indicated discuss in spring 2000 1 file, considered after April 30 th
<u>Ed. 1115.06</u>	3 files: no documentation that LRE is determined annually.
<u>Ed. 1119.07</u>	Paraprofessional is not supervised weekly by special education teacher.

DERRY VILLAGE SCHOOL, Continued

<u>Ed. 1123.05</u>	3 files: no evidence that parental rights provided with IEP notice.
<u>Ed. 1125.03</u>	3 files" written prior notice not consistently provided to parents.
<u>Ed. 1125.04</u>	1 file: no documentation that parents signed for placement.
<u>CFR300.347(a)(4)</u>	2 files: no explanation of extend to which the child will not participate with non-disabled peers in the regular education setting.

SUGGESTIONS:

- Utilization of state forms would address many areas of non-compliance.
- Additional staff is recommended for OT and speech/language services.
- Provide access to computers for the speech/language and resource programs.
- Provide teachers with updated computers and software.
- Paraprofessional time should be driven by student need versus financial/benefit packages.
- Provide staff with additional workshops/training in the areas of ADHD, liability, special education law, review of testing instruments and 504 versus special education.
- Common planning time is needed for regular and special educators.

EAST DERRY MEMORIAL ELEMENTARY SCHOOL

PROGRAM(S) VISITED: 1) Resource Room 2) Support 3) Project Me

COMMENDATIONS:

- The principal and assistant principal are very supportive of the special education programs.
- The environment at the school is child centered with a positive atmosphere.
- Staff are dedicated and continue to provide a successful environment for inclusion.
- The 50/50 initiative was reported to be very successful in improving student performance.
- The district is commended for the extensive work it has done to align curriculum with state frameworks and instructional programming for all children.
- The district is commended for receiving a grant to implement the SCANS Program in cooperation with the NH Institute for Disabilities.
- The school is commended for its looping initiative at grades 1-2 and 4-5.

CITATIONS: (in numerical order)

<u>Ed. 1107.05(k)</u>	2 files: evaluations not conducted with 45 days.
<u>Ed. 1109.01(b)</u>	3 files: Measurable annual goals were not evident.
<u>Ed. 1109.01(g)</u>	1 file: IEP lacked projected dates and duration of services.
<u>Ed. 1111.01</u>	2 files: lacked evidence of consideration of extended school year programming.
<u>Ed. 1119.06</u>	Facilities: The library, art and music rooms are presently used as classrooms.
<u>Ed. 1119.07(a)</u>	The special education teacher of the ME Program holds no endorsement in EH. Of the four special education teachers at the school, the central office records indicate only one teacher is certified in General Special Education; no other certifications were apparent.

SUGGESTIONS:

- More common collaboration and planning time is needed for staff to consult, plan and evaluate.
- The district needs to address the excessive student-to-teacher ratio and continue to move toward more manageable sized classes.
- The district needs a special education procedure manual.
- The district should give serious consideration to adopting the NH model forms for special education. Use of these forms increases compliance significantly as they include all requirements.

FLOYD SCHOOL

PROGRAM(S) VISITED: 1) Resource Room 2) Related Services 3) Modified Regular

COMMENDATIONS:

- The special education teacher is commended for ensuring and documenting that all appropriate staff review IEPs.
- Staff are hard working, skilled and dedicated.
- The general education and special education staff have a good working relationship.
- Most of the teachers within the school use the same behavior program related to expectations in the classroom.
- Whole class lessons provided by the speech therapist are quite impressive.

CITATIONS: (in numerical order)

Ed. 1107.07(c) (3) 3 files: LEA representative not clearly identified at evaluation team meeting.

Ed. 1109.01(c) 1 file: IEP did not list extent of participation in regular classroom.

Ed. 1109.01(g) 3 files: IEP did not list projected dates, duration or location of services

Ed. 1109.01(j) 1 file: IEP did not indicate individuals or providers responsible for implementing goals and objectives.

Ed. 1109.11 3 files: lacked evidence that IEP progress was monitored regularly.

Ed. 1111.01 1 file: lacked evidence that extended school year was considered or that the process was completed by 4/30.

Ed. 1123.05 2 files: lacked evidence that annual notice of rights/procedural safeguards were given at initial referral for evaluation.
3 files: no evidence that annual notice of rights/procedural safeguards were given with notifications of IEP meetings.

SUGGESTIONS:

- Adopt the NHDOE Model forms to help with meeting all compliance.
- All signature pages should indicate the role each team member is serving along with their signature.
- Training for general education staff in the areas of classroom modifications and the special education process is strongly suggested.
- Paraprofessional training on general education curriculum and special education issues is suggested.
- Additional paraprofessional staff is needed.
- Consider the addition of another special ed. staff member to assist with evaluations and implementation of IEPs.

- Clerical assistance is needed to help the special education teacher and team leader with paperwork.

FLOYD SCHOOL, Continued

SUGGESTIONS:

- Revise the current observation report form to provide more writing space for in-depth information.
- The special education staff within the district would benefit by meeting together at least a few times per year to discuss materials, strategies and legal issues.
- The special education teacher needs time to meet and plan with the paraprofessional. Consider extending the paraprofessionals day to provide for that meeting time.
- The speech therapist is in need of therapy and evaluation materials for implementing IEPs.

GRINNELL ELEMENTARY SCHOOL

PROGRAM(S) VISITED: 1) Inclusion 2) Related Services 3) Pullout

COMMENDATIONS:

- All teachers at Grinnell Elementary school provide quality instruction.
- The SCANS programming is working well.
- There is strong collaboration between regular and special ed. staff.
- All staff were described as child centered, skilled and dedicated.

CITATIONS: (in numerical order)

Ed. 1107.05 1 file: unable to determine if evaluation process met requirements; documentation missing.

Ed. 1107.07 1 file: determination of eligibility was not evident.

Ed. 1109.01 The IEPs reviewed lacked a variety of components. Present levels of performance to IDEA requirements needs to be clear and consistent.

Ed. 1111.01 3 files: lacked evidence of consideration of extended school year.

Ed. 1119.01 3 files: lacked measurable goals with benchmarks with the access to general curriculum.

SUGGESTIONS:

- Special education forms need to be uniform and better organized.
- A review of the high student-to-staff ratio is suggested.

SOUTH RANGE ELEMENTARY SCHOOL

PROGRAM(S) VISITED: 1) Resource Room 2) 2nd Grade Classroom 3) 4th Grade Classroom

COMMENDATIONS:

- Staff at South Range Elementary School are committed to integration and show a high level of care and concern for the educational, social and emotional welfare of all students.
- The inclusion facilitator has been of great importance to the success of full involvement of PDD students.
- The district form for identification of learning disability is complete and comprehensive.
- Evaluation and assessments have improved tremendously this year due to the district's support of summer testing.

CITATIONS: (in numerical order)

<u>Ed. 1107.05(k)</u>	2 files: were missing written summary report within 45 days of permission to test and portions of testing were separated by more than 45 days; no extension was on file.
<u>Ed. 1107.02(d)</u>	3 files: no documentation that procedural safeguards were provided to parent(s) with notice of meeting.
<u>Ed. 1109.01(a)</u>	2 files: IEP lacked comprehensive present levels of performance; information provided in “strengths and weaknesses” format.
<u>Ed. 1109.01(b-d, f-h)</u>	1 file: IEP missing district addendum page, which outlines regular education , general curriculum and other housekeeping and IDEA requirements.
<u>Ed. 1109.01(h)</u>	1 file: IEP missing length of school year and day.
<u>Ed. 1109.01(j)</u>	1 file: IEP does not identify service providers.
<u>Ed. 1109.04(a)</u>	1 file: lacked evidence of 10-day notice of meeting; no signed waiver in file.
<u>Ed. 1111.01</u>	2 files: lacked documentation that ESY was considered
<u>Ed. 1123.05</u> <u>CFR300.504(a)</u>	3 files: no evidence of procedural safeguards presented at initial referral, notification of IEP and re-evaluation meetings.
<u>Ed. 1125.04</u>	3 files: contained no documentation or evidence that LRE is determined annually and meets the criteria.
<u>CFR300.347 (a-c)</u>	1 file: missing addendum that addresses all these requirements.
<u>CFR300.346(a,1,iii)</u>	2 files: no indication that NHEIAP testing results were considered.

SUGGESTIONS:

- Consider the adoption of the NH Dept. of Education model forms.

- Provide training to staff in the area of implementation of the special education process.

SOUTH RANGE ELEMENTARY SCHOOL, Continued

SUGGESTIONS:

- Adopt or create clear district and building policies and procedures for special education to include: training, pre-referral, referral, evaluation, IEP, extended school year and state/federal regulatory compliance.
- When possible, pre-determine the next year's regular ed. classroom teacher and insure their participation in the IEP development.
- Documentation needs to be more consistently monitored when transitioning from preschool.
- Increase general classroom support to allow more student assistance and teaching feedback.

GILBERT H. HOOD MIDDLE SCHOOL

PROGRAM(S) VISITED: 1) Modified Regular 2) Project ME 3) Project Read

COMMENDATIONS:

- The atmosphere at the school is student centered and staff are willing to individualize for all students.
- The special education staff are well qualified and their hard work is commended.
- The collaboration between the regular and special education staff is positive and its effect is evident.
- Project ME is an exemplary EH program.
- The school is commended for curriculum alignment with the NH state curriculum frameworks.
- The looping of grades 6 and 7 has proven to be very effective.
- The model of special education teachers following students for 3 years is successful.
- Grades 7 and 8 students are included in IEP meetings.
- The Principal has an incredible presence and is clearly a positive leader.
- The Assistant Principal is articulate and is supportive of quality programs for all students.
- Project ME staff is outstanding, are comfortable in their roles and their physical placement in the building and feel supported by the schools administration.
- The special ed. teachers working in the modified reg. Ed. classrooms are incredibly hard working, “kid-centered” and collegial.
- The overall culture of the school is extraordinarily child centered, extremely positive from every perspective.

CITATIONS: (in numerical order)

<u>Ed. 1107.03(a)</u>	2 files: no evidence that evaluation team included teacher certified in area suspected disability.
<u>Ed. 1107.05(k)</u>	2 files: evaluation was not completed within 45 days and no evidence of waiver on file.
<u>Ed. 1109.01(b)</u>	3 files: annual IEP goals were not measurable and no benchmarks were evident.
<u>Ed. 1109.03</u>	3 files: LEP representative was not clearly identified (individuals must sign and indicate role on team).
<u>Ed. 1109.03(2)</u>	1 file: no evidence of regular education teacher at evaluation meeting.
<u>Ed. 1111.01</u>	1 file: no evidence that ESY was considered.
<u>CFR300.504(a)(2)</u>	3 files: no evidence that procedural safeguards included with notice to parents of IEP meeting.
<u>CFR300.345(b)(2)</u>	3 files: notice of IEP meeting did not indicate purpose was to discuss transition services.

SUGGESTIONS:

- The staff at GHHMS need to work at making stronger connections between the general reading curriculum Project Read.

SUGGESTIONS:

- Cumulative records need to be organized in a systematic order.
- The vision of having one special education teacher per team should be pursued.
- If possible, the skills and role of the school psychologist should be expanded beyond diagnostic assessments. There is a need for more classroom observation, consultation, etc.
- The student-to-counselor ratio is quite high and should be reduced.
- The entire staff and administration would benefit from additional training in the special education process from referral to evaluation. Staff could use more direction and guidance in special education policy and procedures.
- The GHMS staff may want to consider eliminating the initial diagnostic intelligence test conducted on each student. This appears to be an unnecessary assessment and lengthens the referral process.

WEST RUNNING BROOK MIDDLE SCHOOL

PROGRAM(S) VISITED: 1) Modified Regular Classroom 2) Project Read Class
3) Special Study Hall

COMMENDATIONS:

- Staff at WRBMS are hard working and child centered.
- Use of a social worker for home-school connection is to be commended.
- The advisory program that is in place at the school is highly effective.
- Administration is very supportive of staff, students and parents.
- There is a true sense of teamwork among the regular and special education staff that provides for modifications within the general curriculum to be quite successful.
- The atmosphere within the school is child focused with an obvious sense of enthusiasm and school pride.

CITATIONS: (in numerical order)

<u>Ed. 1107.03(a)</u>	1 file: No evidence that qualified examiner and teacher of suspected disability were present at evaluation meetings
<u>Ed. 1107.03(b)</u>	1 file: Child was not assessed in all areas of suspected disability (OT/writing).
<u>Ed. 1107.03(c)</u>	2 files: indicated that WIAT and WISC were given routinely as only evaluations. (WIAT also used as post-test). 1 file: Only CELF was used to determine S/L disability.
<u>Ed. 1107.05(a)</u>	2 files: Not able to determine if qualified examiner administered WIAT test; evaluation was identified as "Resource Room".
<u>Ed. 1107.05(k)</u>	1 file: Evaluation was due 1/99. Team met on 2/99 to request testing. LD evaluation was completed on 4/99; S/L evaluation completed on 8/99; evaluation team met on 9/99. No extensions signed by parent(s) were noted in the file
<u>Ed. 1107.07(c)(1)</u>	1 file: lacked evidence that teacher of suspected disability was on evaluation team.
<u>Ed. 1107.07(c)(3)</u>	2 files: lacked evidence that LEA representative was at meeting.
<u>Ed. 1107.07(c)</u>	3 files: lacked evidence that evaluation report was given to parents.
<u>Ed. 1109.01(b)</u>	1 file: IEP lacked goals that enable child's involvement in general ed. curriculum.
<u>Ed. 1109.01(g)</u>	3 files: IEP lacked expectation of regular class participation.
<u>Ed. 1109.01(h)</u>	2 files: IEP lacked length of school year and day.
<u>Ed. 1109.01(j)</u>	2 files: IEP lacked the individuals or providers responsible for implementation.
<u>Ed. 1109.01(k)</u>	1 file: IEP lacked statement of parties assuming financial responsibility.

Ed. 1109.01(n)

2 files: IEP lacked signatures, including parents, on document.

WEST RUNNING BROOK MIDDLE SCHOOL, Continued

CITATIONS: (in numerical order)

<u>Ed. 1109.03</u>	1 file: lacked evidence that team member who could interpret evaluation results or with other expertise or knowledge was present at IEP or placement meeting.
<u>Ed. 1109.04(a)</u>	3 files: lacked evidence of 10-day notice of IEP meeting. 3 files: lacked evidence that procedural safeguards were given with each notice of IEP meeting.
<u>Ed. 1109.11</u>	3 files: special education teachers did not indicate on IEP progress reports whether progress is sufficient to achieve the goals by the end of the year.
<u>Ed. 1109.11</u>	2 files: lacked evidence of regular and systematic monitoring of IEP or that parents were informed of progress. 1 file: lacked evidence that the progress showed the extent to which the goals could be achieved by the end of the school year.
<u>Ed. 1123.05</u>	3 files: lacked evidence that procedural safeguards were given at initial referral or with each notification of IEP meeting.
<u>Ed. 1123.14</u>	1 file: record of disclosure did not contain name, date or purpose of disclosure.
<u>Ed. 1125.04(a)</u>	1file: lacked written consent to evaluate.
<u>CFR300.344(a)(6)</u> <u>CFR300.347(a)(4)</u>	2 files: lacked evidence of notice of those invited with knowledge or special expertise. 1 file: lacked an explanation of the extent to which the student will participate in regular classes.
<u>CFR300347(a)(5)</u>	1 file: did not indicate that modifications were considered for state or district-wide assessments.
<u>CFR300.347(a)(7)</u>	2 files: lacked a statement of how IEP progress will be measured and how parents will be informed.
<u>CFR300.346(a)(l)(i)</u>	1 file: lacked evidence that parental input on the IEP was considered.

SUGGESTIONS:

- The WRBMS needs to consider the addition of a special education coordinator and special education secretary.
- Consider ways to reduce the caseloads for the special education staff.
- Staff need to specify their position and title in all meeting minutes.
- Consideration should be given to reducing class size.

WEST RUNNING BROOK MIDDLE SCHOOL, Continued
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SUGGESTIONS:

- To ensure the optimal success of inclusion, the following is suggested: class size of 20 or less, a paraprofessional for each team, caseload of 20 or less for each special ed. teacher, additional special education staff, more special and general ed. planning time specifically related to special ed. issues and additional space for the special education staff.
- Speech/language pathologist's goals should reflect service delivery.
- Organize files in a systematic method. Considering having one file for all information on each student.
- Encourage special education teachers to pursue LD, EH and MR endorsements.
- Provide more training on federal special education regulations.
- IEP forms need to include inclusive dates of services, number of days in school year, persons responsible and recommended units of service.
- Design and utilize forms for documentation of consideration of ESY and LRE.
- More detailed team minutes and written prior notice documents are strongly suggested. More detailed documentation is also needed for the evaluation process, placement and evaluation team decisions.
- District-wide special education staff meetings is suggested.
- The addition of another EH/behavior program for students should be considered.
- Additional counselors are needed to meet the needs of the students at WRBMS. The district may want to look at how the school psychologist position is used or consider hiring a school adjustment counselor to work solely with students and their IEP goals.
- WRBMS may want to evaluate the role of "team leader". The position appears to be solely related to paperwork and might be better utilized in additional roles.
- The staff may want to consider a study skills/homework completion program throughout all grades.
- A building coordinator to supervise and coordinate special education activities is strongly recommended.
- The role and responsibilities of the paraprofessionals needs to be reviewed.

PINKERTON ACADEMY

PROGRAM(S) VISITED: 1) Resource Rooms

COMMENDATIONS:

- Special Education staff are committed to and caring of students.
- The special education coordinator and ed. assistant for C-mod classes provides excellent support for the regular ed. teacher
- The music theory class has a high level of interaction, energy and student interest.
- The C-mod earth science class is outstanding. There is a high level of interaction between students and teachers with the complete involvement of all students for the entire period.
- The structure of the resource rooms allows for coordination and teaming.
- The speech/language pathologist provides direct services in the resource rooms.

CITATIONS: (in numerical order)

<u>Ed. 1107.07</u>	2 files: lacked evidence of determination of eligibility.
<u>Ed. 1109.04</u>	3 files: notice of IEP meeting lacked several required components.
<u>Ed. 1109.01</u> <u>CFR300.347</u>	3 files: present level of performance does not include involvement and progress or expectations in regular classes.
<u>Ed. 1111.01</u>	3 files: lacked evidence that ESY was considered.
<u>Ed. 1113.01</u>	1 file: lacked LD deliberation and team signatures.
<u>Ed. 1115.06</u>	3 files: lacked evidence that least restrictive environment was considered.
<u>Ed. 1125.04</u>	2 files: lacked evidence of written consent for placement.
<u>Ed. 1125.04</u> <u>Ed. 1107.06</u>	1 file: lacked all evaluation and eligibility information.
<u>CFR300.347(a)(7)(i)</u>	3 files: statement of how progress will be measured and how parents will be informed was not evident

SUGGESTIONS:

- Creation of a functional file system for student records to facilitate the location of key information is suggested.
- Consider using state forms for all aspects of special education documentation to ensure compliance with state regulations.
- Improved communication between regular and special education staff is strongly recommended to build the trust level between programs.

PINKERTON ACADEMY

PROGRAM(S) VISITED: 1) A.C.T. Program

COMMENDATIONS:

- The A.C.T. Program has a creative and supportive staff .
- The program is child-centered with a genuine sense of community throughout the class.
- There are a variety of highly effective activities designed for students within the A.C.T Program.

CITATIONS: (in numerical order)

Ed. 1107.01, 1107.01
Ed. 1107.01, 1107.01
Ed. 1107.06, 1107.07
Ed. 1113.01, 1125.04 The one file reviewed for the A.C.T. Program lacked all essential evaluation information including consent to evaluate, evidence of a 3-year evaluation, assessment information, team member decisions and consideration of vocational assessment.

Ed. 1109.01(b) 1 file: annual goals were not measurable and there were no indications of benchmarks.

Ed. 1109.03(c) & (d) 1 file: there was no indication that the student's interest was taken into account for transition planning and no evidence of participation of other agencies.

Ed. 1109.04(a) & (d) 1 filed: there was no evidence that the student was invited to the IEP meeting and that the purpose was to discuss transition.

Ed. 1109.08 1 file: students in the A.C.T. Program are eligible for a certificate of completion and do not have the opportunity to earn a high school diploma.

Ed. 1109.11 1 file: evidence of regular and systematic monitoring of the IEP was missing.

Ed. 1119.03(b) 1 file: student enrolled in the A.C.T. Program do not have full access to the schools curriculum including vocational training.

Ed. 1119.08 Diplomas
The practice of excluding the majority of students enrolled in the A.C.T. Program from the opportunity of completing a course of studies leading to a high school diploma is questionable and requires a ruling from the Department of Education.

Ed. 1125.03 1 file: written prior notice did not have all required components.

CFR300.346(a)(2) 1 file: state assessments were not considered.

SUGGESTIONS:

- While the A.C.T. Program is clearly doing an outstanding job in educating students, student records do not reflect the depth and breadth of services received. For example, the student whose file was reviewed regularly receives S/L support, however his IEP does not reflect this nor does it include any speech & language goals.

- The staff at Pinkerton Academy need to explore additional opportunities for A.C.T. students to participate in school activities with non-disabled peers.

PINKERTON ACADEMY

PROGRAM(S) VISITED: 1) C.T.P. Program

COMMENDATIONS:

- The daily staff meetings, often including administration, school nurse and the Special Ed. Director, allows for communication and sharing of "dreams".
- The teacher of the C.T.P. Program is trained in reality therapy and integrates social work, counseling and parental involvement into the curriculum.
- Pre-referral process in place includes interviews with student, parent and staff who all must agree.
- Adventure based Fridays, including three mandatory outings, assures physical education credit.
- The environment is safe, caring and student oriented.
- The transitions planning is excellent.
- Both the student and staff develop individual goals.

CITATIONS: (in numerical order)

<u>Ed. 1125.04(a)</u>	1 file: lacked evidence of written consent to evaluate.
<u>Ed. 1107.02(b)(d)</u>	1 file: lacked referral or written notice of referral to parents.
<u>Ed. 1107.03(b)</u>	1 file: lacked evidence that LRE was considered.
<u>Ed. 1107.06</u>	1 file: lacked evaluation summary.
<u>Ed. 1109.11</u>	1 file: progress notes for IEP goals from past years were not found in file.
<u>Ed. 1111.01</u>	1 file: lacked evidence of consideration of extended school year.
<u>Ed. 1123.05</u>	1 file: lacked evidence that parental rights were given as outlined in state and federal regulations.
<u>Ed. 1125.03</u>	1 file: Written prior notice did not contain required components.
<u>CFR300.504(a)(2)</u>	1 file: lacked evidence that notice of parental rights were given with notification IEP meeting.

SUGGESTIONS:

- More planning time for C.T.P. staff is needed to provide for consistent behavior management
- Additional staff is needed in order to provide adequate coverage for in-school suspension, transition meetings and planning for island for science project .
- Need additional staff in such an intense self contained setting to provide coverage for breaks, lunch and secretarial duties.

PINKERTON ACADEMY

PROGRAM(S) VISITED: 1) TEHP Program

COMMENDATIONS:

- There is a good staff-to-student ration within the program.
- Students view the program as a safe place to be and utilize it as necessary.
- The staff of the TEHP program work well with this student population.

CITATIONS: (in numerical order)

Ed. 1107.05(a) 1 file: evaluation time exceeded 45 day timeline.

Ed. 1109.01(b) 1 file: annual goals contained in IEP were not measurable and lacked benchmarks.

Ed. 1109.04(d) 1 file: notice of IEP meeting did not include purpose (transition services) and did not identify parties invited.

Ed. 1111.01 1 file: consideration of extended school year was not documented.

Ed. 1125.03 1 file: written prior notice lacked required components.

SUGGESTIONS:

- Files need to be organized in a systematic order.
- Prescreening responsibilities may tax the counselors schedule whose time would be better utilized on crisis intervention.
- Pinkerton Academy needs to explore options that could be developed for students requiring services for less than half the day.

PINKERTON ACADEMY

SUMMARY OF ALL PROGRAMS

CITATIONS: (in numerical order)

Ed. 1103.02 Child Find

Referral statistics for 1998-1999 show 102 Derry students being referred for special education services. At least fifty percent of the referrals resulted in identification as eligible for special education, three of the referrals were for students identified as mentally retarded. The high rate of referrals indicates a serious breakdown in the effectiveness of the Derry School Districts ChildFind Program and needs to be corrected immediately.

Ed. 1109.08

It appears that the number of special education students dropping out of school is excessive. Dropout information needs to be analyzed to determine the extent of this matter and to then be appropriately addressed.

Ed. 1115.03(h)

Placement teams of the Derry Middle School(s) need to include representatives from Pinkerton Academy. In addition, transition issues for individual students need to be discussed at team meetings prior to placement and included in IEPs.

Ed. 1119.09 and 1119.02

Some students are at high risk for not completing a course of studies to earn a high school diploma because of the absence of academic support and/or appropriately designed courses for the academic areas, particularly English and Math. Consideration of the establishment of functional English and Math courses as replacement courses needs to occur.

Ed. 1119.09

Special education services at the 11th and 12th grades need to be increased beyond current levels, including modified academic courses and expanded academic supports.

SUGGESTIONS:

- Efforts aimed at increasing collaborative planning, instruction and evaluation time between the special education department and academic departments needs to be increased and strengthened.
- Pinkerton Academy's special education department should have access to SPEDIS data for non-personally identifiable information. Access to this interactive database would allow the special education staff to utilize state-wide data for comparative purposes.

OUT-OF-DISTRICT FILES

COMMENDATIONS:

- The district makes a strong effort to monitor progress and programming for students placed out-of-district.
- There is a good working relationship between out-of-district placements and the Derry School District.

CITATIONS: (in numerical order)

<u>Ed. 1107.03(a)</u>	1 file: lacked an evaluation summary, therefore reviewer was unable to determine if evaluation team was appropriately composed.
<u>Ed. 1107.06</u>	1 file: lacked current evaluation summary report.
<u>Ed. 1107.07(c)(1)</u>	1 file: reviewer was not able to determine if there was a teacher certified in the area of suspected disability, an LEA representative or parent on team due to missing summary report.
<u>Ed. 1109.01(b)</u>	3 files: the IEPs reviewed did not contain measurable annual goals.
<u>Ed. 1109.01(l)</u>	1 file: IEP lacked appropriate transition plan.
<u>Ed. 1109.04</u>	1 file: notice of IEP meeting did not include who was invited.
<u>Ed. 1109.08</u>	1 file: lacked evidence that student had equal educational opportunities to earn a high school diploma.

SUGGESTIONS:

- The SAU need to take a critical look at the number of high school students considered for out-of-district placement.
- The SAU needs to ensure that private facilities are complying with IDEA regulations in the writing of IEPs.
- The SAU needs to document the opportunity to earn a high school diploma for high school students placed out-of-district.
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ADDENDUM

JAMES O. MONITORING PROGRAM

SAU 10

Student File Review

Case Study Document

Reimbursement Claim Form

Case Study Addendum Form

<p style="text-align: center;">ADDENDUM JAMES O. MONITORING PROGRAM</p>

SAU 10

NUMBER OF FILES REVIEWED: . 3 FILES

COMMENDATIONS:

- The SAU has an open line of communication with the court system and makes a genuine attempt to ensure active involvement in educational decisions for students court ordered to private facilities.

CITATIONS: (in numerical order)

Ed. 1103.03(d) 1 file: when the court order was issued and the LEA joined, the team convened but an LEA representative did not appear to be present.

Ed. 1109.01(a-n) 1 file: lacked current IEP, the document in the file expired in November 1999. Upon contact with the private school, it was indicated that a meeting was in process of being scheduled.

Ed. 1123.14 1 file: lacked record of disclosure information.

Ed. 1130.03(g) 1 file: written prior notice for the above mentioned meeting was not provided to the parent and the team did not provide the court with a copy of recommendations.

SUGGESTIONS:

- The school district needs to ensure that all paperwork/documentation is up-dated and provided to the private facility as outlined in state and federal special education regulations.
- It is strongly suggested that the school distinct obtain a student schedule documenting services made available to the child.